

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

DIANA BURKINDINE

Plaintiff,

V.

CIVIL ACTION NO

ARROW FINANCIAL SERVICES, LLC

Defendant.

JANUARY 29, 2008

COMPLAINT

1. Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692; Md. Ann. Code Commercial Law Maryland Consumer Debt Collection Act. § 14-204 et seq. ("MCDCA"); and the Md. Ann. Code Commercial Law Consumer Practices Act § 13-301 et seq.
2. The Court's jurisdiction is conferred by 15 U.S.C.1692k and 28 U.S.C. 1331 and 1367.
3. Plaintiff is a natural person who resides in MD.
4. Plaintiff is a consumer within the FDCPA.
5. Defendant is a debt collector within the FDCPA.
6. Defendant communicated with plaintiff or others on or after one year before the date of this action, in connection with collection efforts with regard to plaintiff's disputed personal debt to Pepco.

7. The plaintiff contacted the defendant via telephone in an attempt to dispute a debt alleged by defendant to be owed by plaintiff.

8. The defendant advised plaintiff that she had no right to dispute the alleged debt owed.

9. In the collection efforts, the defendant violated the FDCPA, inter alia, section 1692e, -f and -g.

## SECOND COUNT

10. The allegations of the First Count are repeated and realleged as if fully set forth herein.

11. Within three years prior to the date of this action Defendant has engaged in acts and practices as to plaintiff in violation of the Md. Ann. Code Commercial Law Maryland Consumer Debt Collection Act § 14-204 et seq. ("MCDCA").

12. Defendant has committed unfair or deceptive acts or practices within the meaning of the Md. Ann. Code Commercial Law Consumer Practices Act § 13-301 et seq.

WHEREFORE plaintiff respectfully requests this Court to:

1. Award plaintiff such damages as are permitted by law both compensatory and punitive, including \$1,000 statutory damages for each communication against the defendant;
2. Award the plaintiff costs of suit and a reasonable attorney's fee;
3. Award declaratory and injunctive relief, and such other and further relief as law or equity may provide

THE PLAINTIFF

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